

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792-0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

April 5, 2021

**Via Electronic Filing**

The Honorable Magistrate Judge Debra C. Freeman  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Evans v. Manhattan Carpets Inc. et al*  
Case No.: 19-cv-10298

Dear Honorable Magistrate Judge Freeman:

This law firm is counsel to Defendants Manhattan Carpets Inc. d/b/a Manhattan Carpet & Flooring and David Stanger (together, the “Defendants”) in the above-referenced action.

Pursuant to Rule I(B) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to adjourn the Settlement Conference scheduled for April 15, 2021 to a date and time set by the Court on or after the week of May 24, 2021.

If granted, this request would not affect any other scheduled deadlines.

This is the first request of an adjournment of the Settlement Conference, and is not made on consent of Plaintiff’s counsel, who declined to provide a basis for his objection.

The basis of this request is that Defendants intend to depose Plaintiff prior to the Court-Ordered Settlement Conference.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
Jason Mizrahi  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Tel.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Defendants*

To: All Counsel of Record (via ECF)